

## REMARKS

Applicant respectfully requests entry of the above amendments and reconsideration in view of the amendments and the following remarks.

The Examiner rejected claims 1-2, 3-11, and 14-20 under 35 U.S.C. §102(b) as being anticipated by Ouellette et al. (US Pat. No. 5,581,243).

The Examiner objected to claims 3, 12, and 13 as being being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants' gratefully acknowledge the Examiner's indication of allowable subject matter and have rewritten claims 3 and 12 in independent form.

### 35 U.S.C. §102(b)

The Examiner rejected claims 1-2, 3-11, and 14-20 under 35 U.S.C. §102(b) as being anticipated by Ouellette et al. (US Pat. No. 5,581,243).

The Examiner alleges that [r]egarding claims 1-2, 3-11, and 14-20, "Ouellette, et al. teach a handheld device for rapidly and easily inputting text, comprising: a display (52) for showing the input of text; and a touch pad (50) disposed adjacent display (52) that simulates a keyboard (see Fig. 3), touch pad (50) being pressure sensitive (see the abstract), wherein finger pressure will input textual information upon display (52) (col. 3, lines 42-51)." [Detailed Action, Page 2]

Applicants respectfully contend that Ouellette et al. do not anticipate claims 1 and 11, because Ouellette et al. do not teach each and every feature of claims 1 and 11. For example, Ouellette et al. do not teach "a handheld device for rapidly and easily inputting text, comprising: a display for showing the input of text; and a touch pad disposed on said handheld device but not

over said display.” Rather, Ouellette et al. teaches “ a simulated keyboard being displayed on a touch-sensitive display of a computer as a ‘phantom’ or ‘ghost’ image *super-imposed on*, ..., the displayed output screen ... .” [ Ouellette et al., column 2, line 65 to column 3, line 2. Emphasis supplied] “Preferably, the touch screen 24, *overlays, i.e., mounts as a frontplate directly over*, the output screen 28 [Ouellette et al., column 4 , lines 57 to 50. Emphasis supplied].

Based on the preceding argument, Applicants respectfully maintain that Ouellette et al. do not anticipate claims 1 and 11, and that claims 1 and 11 are in condition for allowance. Since claims 2-10 depend from claim 1, and claims 14-20 depend from claim 11, Applicant contends that claims 2-10 and 14-20 are likewise in condition for allowance.

### CONCLUSION

In summary, based on the preceding arguments, Applicant respectfully believes that all independent claims and dependent claims meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicant invites the Examiner to contact Applicant’s representative at the telephone number listed below.

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## **Appendix A. Identification of Amended Material**

Please amend claims 1, 3, 4, 5, 11, 12, 14 and 15 as follows:

1. (Amended) A handheld device for rapidly and easily inputting text, comprising: a display for showing the input of text; and a touch pad disposed [adjacent] disposed on said handheld device but not over said display [that simulates a keyboard], said touch pad being pressure sensitive, wherein finger pressure will input textual information upon said display.

3. (Amended) [The handheld device in accordance with claim 1, wherein said device further comprises] A handheld device for rapidly and easily inputting text, comprising: a display for showing the input of text; and a touch pad disposed adjacent said display that simulates a keyboard, said touch pad being pressure sensitive, wherein finger pressure will input textual information upon said display, and further comprising means for adjusting pressure threshold of said touch pad, below which said display is dormant and above which said finger positions are displayed.

4. (Amended) The handheld device in accordance with claim 1, wherein said touch pad comprises a keyboard [simulated] for [ergonomic] placement of fingers.

5. (Amended) The handheld device in accordance with claim 1, wherein said touch pad comprises a [simulated] standard keyboard configuration.

11. (Amended) A handheld portable electronic device for inputting text in a relatively rapid manner, comprising: a display for showing the input of text; and a touch pad disposed [adjacent] on said handheld device but not over said display [that simulates a keyboard], said touch pad being pressure sensitive, wherein finger pressure inputs finger positions and textual information upon said display.

12. (Amended) [The handheld portable electronic device in accordance with claim 11,] A handheld portable electronic device for inputting text in a relatively rapid manner, comprising: a display for showing the input of text; and a touch pad disposed adjacent said display that simulates a keyboard, said touch pad being pressure sensitive, wherein said device further comprises means for distinguishing thresholds for pressure applied to said touch pad.

14. (Amended) The handheld portable electronic device in accordance with claim 11, wherein said touch pad comprises a keyboard [simulated] for [ergonomic] placement of fingers.

15. (Amended) The handheld portable electronic device in accordance with claim 11, wherein said touch pad comprises a [simulated ] standard keyboard configuration.